Remarks

Applicants respectfully request reconsideration of the present U.S. Patent application as amended herein. No claims have been amended, added or canceled. Thus, claims 1-47 are pending.

Objections to the Specification

The specification was objected to for various informalities. The proposed amendments have been made herein. Accordingly, Applicant requests that the objection to the specification be withdrawn.

Claim Rejection - 35 U.S.C. § 102(e) - Claims 1-8, 16, 18 20-29 and 34-43

Claims 1, 20 and 34 were rejected as being anticipated by U.S. Patent No. 6,810,339 issued to Wills (*Wills*). Applicant respectfully submits that Applicant's invention as claimed in claims 1, 20 and 34 are not anticipated by *Wills*.

Claim 1 recites:

> a trigger circuit coupled with the voltage sampling circuit to, in response to a triggering event, cause samples corresponding to a predetermined time period preceding the triggering event and a predetermined time period after the triggering event to be captured.

Claim 20 recites:

> capturing voltage samples in response to the triggering event, wherein the captured voltage samples correspond to a predetermined time period preceding the triggering event and a predetermined time period after the triggering event.

Claim 34 recites:

capture voltage samples in response to the triggering event, wherein the captured voltage samples correspond to a predetermined time period preceding the triggering event and a predetermined time period after the triggering event.

The Office Action points to *Wills*, column 10 lines 15-24 and lines 49-53 as disclosing:

. . . capturing voltage samples in response to the triggering event, wherein the captured voltage samples correspond to a predetermined time period preceding the triggering event and a predetermined time period after the triggering event . . .

See page 3. Applicant respectfully disagrees with this conclusion.

Wills appears to disclose detecting a voltage change by comparing samples at two different times, and the result of this comparison can be used to trigger anti-islanding solutions as stated in column 10 lines 15-24 and lines 49-53. Therefore, two samples are captured before the triggering event. Claims 1, 20 and 34 claim to capture voltage samples corresponding to a predetermined time period after the triggering event in addition to capturing voltage samples corresponding to a predetermined time period preceding the triggering event.

Claims 2-8, 16 and 19 depend from claim 1. Claims 21-29 depend from claim 20. Claims 35-43 depend from claim 34. Because dependent claims include the limitations of the claims from which they depend, applicants submit that claims 2-8, 16, 19, 21-29 and 35-42 are not anticipated *Wills* for at least the reasons set forth above.

Claim Rejection - 35 U.S.C. § 103(a) - Claims 9-15, 17, 19, 30-33 and 44-47

The Office Action rejects claims 9-15, 17, 19, 30-33 and 44-47 under 35 U.S.C. §103(a) as being obvious over *Wills* and U.S. Patent No. 5,508,607 issued to Gibson

(*Gibson*). For at least the following reasons set forth below, Applicants submit that claims 9-15, 17, 19, 30-33 and 44-47 are not rendered obvious by *Wills* and *Gibson*.

The combination of *Wills* and *Gibson* is improper for lack of motivation because *Wills* appears to disclose an anti-islanding converter that ensures distributed power generation equipment will de-energize when the connection to the main utility power source is lost on 120V nominal grid system (see column 4 lines 51-58 and column 9 lines 59-60) while *Gibson* appears to disclose a test instrument similar to digital multimeter that is limited by a 3.2 volt peak fixed stimulus voltage (see column 3 lines 46-47 and column 7 lines 46-48). Neither reference provides motivation or suggestion for the type of combination set forth in the Office Action.

Claims 9-15, 17 and 19 depend from claim 1, claims 30-33 depend from claim 20 and claims 44-47 depend from claim 34. As discussed above, *Wills* cannot teach or suggest the invention as claimed in claims 1, 20 and 34 because *Wills* fails to disclose capturing voltage samples corresponding to a predetermined time period preceding the triggering event and a predetermined time period after the triggering event.

While *Gibson* does disclose capturing data, the period of time for capturing data is based on the trigger circuit frequency, not the frequency of the data that is analyzed. Therefore the predetermined period of time before or after the triggering event is restricted to one cycle before the triggering event, where said cycle is based on the trigger circuit frequency. See column 8 line 62 – column 9 line 1. Applicants claim a system, method and article for capturing data for a predetermined time period either before or after a triggering event, where said time period is based on a sampling rate that is greater than a frequency of power supplied to the power network.

Because dependent claims include the limitations of the claims from which they depend, applicants submit that claims 9-15, 17, 19, 30-33 and 44-47 are not anticipated *Wills* for at least the reasons set forth above. Because *Gibson* is not cited to cure the deficiencies of *Wills*, nor does *Gibson* cure the deficiencies of *Wills*, no combination of *Wills* and *Gibson* can teach or suggest the invention as claimed in claims 9-15, 17, 19, 30-33 and 44-47.

Conclusion

For at least the foregoing reasons, Applicants submit that the rejections have been overcome. Therefore, claims 1-47 are in condition for allowance and such action is earnestly solicited. The Examiner is respectfully requested to contact the undersigned by telephone if such contact would further the examination of the present application. Please charge any shortages and credit any overcharges to our Deposit Account number 02-2666.

Respectfully submitted,

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